

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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In the Matter of	)	
	)	
Indiana Utility Regulatory Commission's	)	
Petition for Additional Delegated Authority	)	NSD File No. L-99-82
To Implement Number Conservation	)	
Measures	)	
	)	
	)	
Implementation of the Local Competition	)	
Provisions of the Telecommunications	)	CC Docket No. <u>96-98</u>
Act of 1996	)	
	)	
	)	
Numbering Resource Optimization	)	CC Docket No. 99-200

**INDIANA UTILITY REGULATORY COMMISSION'S  
REQUEST FOR EXPEDITED RULING AND  
SECOND SUPPLEMENT TO PETITION FOR ADDITIONAL DELEGATED  
AUTHORITY  
TO IMPLEMENT NUMBER CONSERVATION MEASURES**

The Indiana Utility Regulatory Commission ("IURC") submits to the Federal Communications Commission ("FCC") this second supplement to its petition for additional delegated authority pertaining to number conservation measures. Herein, the IURC is providing information about the 219 Number Plan Area (NPA), and requesting authority to implement mandatory thousand-block number pooling in the 219 NPA. The IURC believes that thousand-block number pooling, along with other number conservation measures could potentially improve the efficient use of numbering resources in the 219 NPA.

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## BACKGROUND

On October 21, 1999, the IURC filed a petition with the FCC for additional delegated authority to implement various number conservation measures (“Delegated Authority Petition”). On March 17, 2000, the FCC adopted its Numbering Resource Optimization Order (“NRO Order”).<sup>1</sup> Among other things, the NRO Order outlined a national thousand- block number pooling framework.<sup>2</sup> Additionally, the NRO order outlined criteria (“NRO Criteria”) for granting state commissions authority to implement mandatory thousand-block number pooling.<sup>3</sup>

On July 20, 2000, the FCC adopted an order addressing the pending petitions for delegated authority of sixteen (16) state utility commissions, including the IURC.<sup>4</sup> The IURC was not granted authority to implement thousand-block number pooling because the IURC had not supplemented its petition.<sup>5</sup> Believing that none of the NPAs in Indiana met the NRO Criteria, the IURC did not immediately supplement its pending petition following the release of the NRO Order. However, on August 25, 2000, the IURC submitted information to the FCC supplementing (“First Supplement”) its original petition with respect to the 317 NPA and asking for authority to implement thousand-block number pooling in the 317 NPA.<sup>6</sup> In this present petition, the IURC submits information to supplement its original petition with respect to the 219 NPA.

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<sup>1</sup> CC Docket 99-200, order adopted March 17, 2000, released March 31, 2000.

<sup>2</sup> Id., ¶ 116.

<sup>3</sup> CC Docket 99-200, order adopted March 17, 2000, released March 31, 2000, ¶ 170.

<sup>4</sup> CC Docket 99-200, CC Docket 96-98, NSD File No. L-99-100, NSD File No. L-00-16, NSD File No. L-99-98, NSD File No. L-99-82, NSD File No. L-99-96, NSD File No. L-00-08, NSD File No. L-99-90, NSD File No. L-99-83, NSD File No. L-99-97, NSD File No. L-00-29, NSD File No. L-99-101, NSD File No. L-99-94, NSD File No. L-99-89, NSD File No. L-99-95, 99-102, order adopted and released July 20, 2000

<sup>5</sup> Id., ¶

## DISCUSSION

In order to be granted authority to implement mandatory thousand block number pooling, according to the NRO Criteria, a state's request must demonstrate: (1) that a NPA in the state is in jeopardy; (2) that the NPA in question has a remaining life span of at least one year; and (3) that the NPA is in one of the largest 100 Metropolitan Service Areas, or, alternatively, that the majority of wireline carriers in the NPA are capable of Long Term Number Portability (LTNP).<sup>7</sup> The NRO Order permits state commissions to supplement their pending petitions for delegated authority by providing information substantiating compliance with the NRO Criteria.<sup>8</sup>

The IURC provides the following information about the 219 NPA in order to demonstrate that it meets the NRO Criteria necessary to grant the IURC authority to implement mandatory thousand-block numbering pooling in the 219 NPA. The 219 NPA meets the three component parts of NRO Criteria for these reasons: the 219 NPA is currently in jeopardy status; the 219 NPA has more than a year of life,<sup>9</sup> and the majority of wireline carriers in the 219 NPA are LTNP-capable.<sup>10</sup> Therefore the 219 NPA satisfies the NRO Criteria for granting the IURC authority to implement mandatory thousand-block number pooling.

In addition to complying with the NRO Criteria, the IURC contends that the 219 NPA presents a unique opportunity to maximize the benefits of thousand-block number pooling. The IURC is actively exploring the prospects for rate center consolidation,<sup>11</sup> which will greatly

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<sup>6</sup> Letter to Ms. Magalie Roman Salas, Office of Secretary, Federal Communications Commission, dated August 25, 2000.

<sup>7</sup> Id.

<sup>8</sup> Id.

<sup>9</sup> According the May 23, 2000, Central Office Code Utilization Survey, the 219 NPA is projected to exhaust in the 1<sup>st</sup> quarter of 2003.

<sup>10</sup> According to testimony taken by the IURC during a September 19, 2000, hearing, the three Incumbent Local Exchange Carriers that serve more than 90% of the rate centers in the 219 NPA are LTNP capable.

<sup>11</sup> Cause No. 41535, In re: The Matter of an Investigation Initiated on the Commission's Own Order Regarding Projected Exhaustion of Allocable Telephone Numbers with the Various Number Plan Areas (NPAs), Throughout the State of Indiana, Docket Entry issued October 4, 2000.

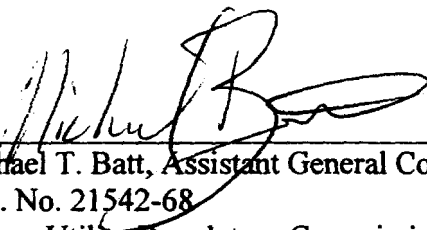
increase the effectiveness of thousand-block number pooling. The Commission is also considering additional area code relief options for the 219 NPA.<sup>12</sup>

Thousand-block number pooling will extend the life of the 219 NPA, delaying the need for costly and disruptive area code relief. Furthermore, thousand-block number pooling, working in conjunction with alternative methods of number conservation, will provide immediate relief to the current crises as well as ensure higher number utilization rates for future NPAs.

In light of the current crisis in the 219 NPA, and additional matters now pending before the IURC, the IURC respectfully requests that this matter receive expedited consideration.

#### CONCLUSION

For the reasons stated above, the IURC urges the FCC to expeditiously grant additional delegated authority to the IURC to implement mandatory thousand-block number pooling in the 219 NPA.

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<sup>12</sup> Cause No. 41535, Area Code Relief Phase.